



Hastings Development Management Plan (DMP) Examination: Submission on behalf of Bourne Leisure Ltd. in relation to Matter 3: Employment, Economic Development and Town Centres

1.0 Introduction

1.1 This statement, on behalf of Bourne Leisure Ltd., addresses Matter 3: Employment, Economic Development and Town Centres and the specific question posed by the Inspector:

3.7: Is tourism sufficiently promoted? Could the Plan do more to encourage it? Are all the Borough's attractions being sufficiently promoted to serve the local economy (e.g. Burtons' St Leonards, Hastings Castle and caravan and camping sites)?

2.0 Background

2.1 By way of background, Bourne Leisure is the UK's leading operator of holiday centres, with more than 50 holiday sites in the UK, in the form of holiday parks, family entertainment resorts and hotels and holiday resorts. These are managed by a number of subsidiary companies which include Haven, Butlins and Warner Hotels. The Parks and hotels make a significant contribution to their local economies and the wider economy, generating expenditure and supporting both direct and indirect employment.

2.2 Bourne Leisure owns and operates the Combe Haven Holiday Park at Bulverhythe, within Hastings.

2.3 In recent years, Bourne Leisure has experienced increased visitor demand for higher quality accommodation and facilities, and for improved park standards, services, entertainment and eating establishments. The Company has responded by upgrading its sites and facilities and this has enabled a move towards their more extensive use during off-peak times throughout the year. Bourne Leisure invested £104m in 2011 and over £117m in 2012 in improving its existing sites to ensure that they meet customers' expectations.

3.0 The Importance of Tourism in the UK

3.1 The value of tourism to the UK economy in 2013 was £126.9bn GDP which equates to 9.0% of UK GDP (Source: Tourism Alliance, 2014). The UK tourism industry employs 3.1m people (2013) and is the UK's third largest employer, accounting for 9.6% of total employment. In addition, tourism is the fastest growing sector in the UK in employment terms and was responsible for almost one third of the net increase in UK jobs between 2010 and 2013. There are some 249,000 tourism businesses in the UK and tourism businesses account

for 9.8% of all businesses in the UK (Source: Tourism: jobs and growth, VisitBritain / Deloitte, 2013 and The Geography of Tourism Employment and Supply Side of Tourism Report, Office for National Statistics, 2012, as reported in Tourism Alliance Statistics for 2014). At a local level, revenue generated by tourism development is often vital to the economic well-being of an area and is boosted by the multiplier effect, as money spent by visitors to an area is re-circulated in the local economy.

3.2 Recent research suggests that the average spend per stay for in bound tourists is £638 (Source: International Passenger Survey, Office for National Statistics, 2014) and for domestic tourists, £190 (Source: GBTS, VisitEngland, 2013). Moreover, the total UK tourism spend on accommodation services for visitors in 2013 was £13,059 million (Source: Office for National Statistics, 2013, as reported by Tourism Alliance, 2014).

3.3 It is clear that the income generated by tourism nationally and therefore locally - and by the provision of suitable tourism accommodation in particular - can be very significant, particularly to the economic wellbeing of a local area. This is a clear reason why local plans in areas with visitor economies should be drafted to maintain and enhance all aspects of the tourism industry and particularly, the provision of a range of types of visitor accommodation.

4.0 **The Economic, Social and Environmental Benefits of Holiday Parks**

4.1 Nationally, the nature of holidays has become increasingly more diverse in terms of location, season and duration and more people are now going on holiday several times a year, more often for shorter time periods and not necessary during the summer. Much of this demand is for self-catering accommodation in new and converted buildings and in static holiday caravans and holiday chalets. The spread of tourism outside of the traditional holiday period, and the associated employment and economic benefits, should be encouraged (whilst it is acknowledged that permanent use of holiday parks is to be discouraged)

4.2 The UK holiday parks' industry currently generates an annual £3.06 billion of tourism spending, which accounts for 14% of Britain's entire tourism economy (Source: British Holiday and Home Parks Association (BH&HPA, 2010). Holiday parks support a large number of jobs, employing people directly on-site and indirectly off-site. According to research undertaken by the BH&HPA, holiday parks typically contribute around 20% of the income in rural economies in popular tourism areas and sustain around 15% of tourism related full-time and seasonal jobs (BH&HPA, 2010).

4.3 Park visitors specifically also contribute substantially to local economies, sustaining local businesses and acting as a catalyst for the development of new facilities such as shops, bars and leisure facilities. The patronage of holiday park visitors ensures that many businesses remain viable. The highest

category of expenditure by visitors is on eating and drinking out, followed by purchasing food and drink from off-park shops, and then on transport. Research undertaken on behalf of BH&HPA found that each privately-owned holiday caravan produces an annual spending in the local economy of more than £6,400; and that this figure increases to almost £18,500 for caravans that are rented on a weekly or fortnightly basis (BH&HPA, 2010).

- 4.4 Holiday parks also offer a number of non-financial benefits to a local area. For example, some facilities at holiday parks are open for the benefit of local residents, both in and out of season, and play a key role in developing a socially cohesive community. In addition, the presence of additional people in an area can result in increased public transport services which benefit local residents too. Many parks have also implemented a range of environmental initiatives, include providing and maintaining wildlife areas, wetlands and woodland walks, maintaining local footpaths and coastal paths, protecting sand dunes, repairing sea defences and providing information boards for areas of local environmental interest.
- 4.5 Given the importance of tourism to the local economy, it is important for the Development Management Plan to do more to promote tourism within the borough.

5.0 **Combe Haven Holiday Park**

- 5.1 Combe Haven Holiday Park employs 300 permanent and seasonal staff and attracts around over 100,000 visitors a year and in addition the park's caravan owners community, thereby contributing significantly in the ways described above to Hastings' local economy.
- 5.2 During the past five years, investment at Combe Haven has included alterations to the main reception building, improvements to the swimming pool complex and the creation of a new car parking area and visitors entrance, in addition to the upgrading of accommodation referred to below. Bourne Leisure undertakes an ongoing and continuous programme of improvements to the Park, in order to ensure that it remains competitive and meets visitors' expectations.
- 5.3 During 2012/13, a number of redundant chalets were demolished and fifty new, fully serviced caravan bases were introduced. During 2013/14, a further 25 fully serviced caravan bases were introduced and works were completed on the redevelopment of the central complex zone to include the formation of an all-weather multi-sports court, a children's play area, pedestrianisation and associated landscaping. Over the 2014/2015 period, Bourne Leisure intends to entirely refurbish the indoor sports area (at a cost of £500,000) and construct a flood protection bund for the lower areas of the Park (circa £800,000). The existing Burger King will be also be refurbished (at a cost of £130,000). This

local investment has a significant benefit to boosting the local economy, both directly and indirectly.

5.4 Bourne Leisure is continuing to look at opportunities to improve the Park, in terms of upgrading accommodation and facilities and will also look for opportunities to expand in the longer term. For the following year, 2015/16, Bourne Leisure intends at the very least to develop a number of new caravan bases. This continuous investment in the Park clearly – directly and indirectly - helps very considerably to support local employment in the Borough.

6.0 **Is Tourism sufficiently promoted?**

6.1 Considering the significance of tourism to the Borough, as referred to above and as recognised in both the Hastings Planning Strategy (2014) and the Hastings Visitor Accommodation SPD (March 2011) - which recognises that the tourist industry is an important component of the local economy in Hastings, contributing £211m to the local economy and supporting an estimated 4,850 jobs (paragraph 1) - Bourne Leisure concludes that tourism is not sufficiently promoted in the DMP.

6.2 In particular, Bourne Leisure considers that at present insufficient recognition is given to both the significance of tourism and to the overall priorities for tourism (as set out in the Planning Strategy), to promote tourism further.

6.3 The Hastings Planning Strategy cites as its priorities:

- Working towards an all year round tourist season is a key aim for the town;
- We need to encourage more short-stay visitors with a higher spending power;
- We need to retain and support improved accommodation;
- Key to this is the need to retain and improve visitor attractions, whenever opportunities occur but particularly along the seafront; and
- Continue to recognise the economic importance of language schools to the town.

6.4 The Company considers that these aims could be recognised within specific tourism policies within the DMP, along with greater recognition being given to the “*lack of quality visitor accommodation*” (paragraph 9.20, Planning Strategy).

6.5 In view of this, Bourne Leisure considers that at present policies within the DMP do not sufficiently promote new and improved visitor accommodation in general, although it is recognised that Policy CC1 supports new and expanded caravan, camping and chalet sites and allows for the intensification and reorganisation of existing sites and the enhancement of /provision of new facilities.

7.0 **Could the Plan do more to promote tourism?**

7.1 Bourne Leisure considers that the DMP could provide more policy support for tourism in general, given its acknowledged importance as a major contributor to the local economy. Bourne Leisure considers that the DMP should include policies which promote tourism and the visitor economy generally, and specific policies which support the strengthening of the tourism accommodation base. Enhancing visitor accommodation and improving facilities will attract higher spending visitors to the borough and also bring further spin-offs for the local economy.

7.2 This policy approach would reflect guidance in the Hastings Visitor Accommodation Supplementary Planning Document (SPD) (March 2011), for example, paragraph 2 which notes that staying visitors are a particularly important element of the tourist economy, and paragraph 3 which states:

'The provision of new visitor accommodation and the maintenance and, where necessary, improvement of existing accommodation are therefore of key importance to the town.'

7.3 It would also reflect Policy E4: Tourism and Visitors of the Hastings Planning Strategy and be consistent with paragraph 28 of the National Planning Policy Framework (NPPF), which supports "...the provision and expansion of tourist and visitor facilities in appropriate locations".

7.4 In addition, in order to promote tourism development, the DMP policies should take into account not only environmental but also the economic and social objectives for the area, including promoting tourism, and carefully balance environmental matters (for example, the protection/ scope for enhancement of sites of nature conservation value or landscape value) with the economic and social benefits of specific development proposals.

7.5 On-going investment in new and additional facilities is required to sustain the competitive appeal of Hastings as a tourism destination, and to respond effectively to changing needs of visitors, and it is important that policies do not limit the enhancement and expansion of tourism facilities/accommodation. Moreover, as recognised at paragraph 113 of the National Planning Policy Framework, there is a need to distinguish between the hierarchy of international, national and locally designated sites, "*so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks*".

8.0 **Are the Borough's attractions being sufficiently promoted to serve the local economy?**

8.1 Bourne Leisure proposes to respond to this question specifically in relation to holiday parks and Policy CC1.

9.0 **Policy CC1- Caravan, Camping and chalet sites**

9.1 Bourne Leisure considers that a wide range of high quality self-serviced accommodation, including holiday parks, is essential to providing visitors with choice and notes that high quality static holiday caravan and holiday chalet sites make a vital contribution to providing a variety of high standard tourist accommodation (as recognised at paragraph 5.35 of the Revised Proposed Submission Version of the DMP, 2014). The Company therefore strongly supports the general principles of Policy CC1 which allows new and expanded caravan, camping and chalet sites.

9.2 Whilst some sites have already seen progressive improvement, many require upgrading and improvement to meet visitors' expectations, which may require some expansion of the site area. Bourne Leisure considers that the current wording of Policy CC1 as currently written promotes tourism well and does not require further amendment. In particular, the scope for intensification, reorganisation and enhancement of sites accords with paragraph 9.22 of the Hastings Planning Strategy which states in relation to caravan and camping accommodation:

“maintaining and where possible improving, the quality of what is there is important. Therefore, any proposals to upgrade the facilities will be supported wherever possible – in order to support jobs growth and encourage continued visitor spend.”

9.3 Policy CC1, as currently written, supports the enhancement and reorganisation of sites.

9.4 Bourne Leisure supports paragraph (d) of Policy CC1 as currently written, and the deletion of the earlier draft of this criterion (then (e) in the Submission Draft, 2013) which required a minimum of one third of the total number of pitches being reserved for touring caravans and campers, which was felt far too prescriptive. Due to the substantial range in the size, nature and location of sites, Bourne Leisure considers that it is important that each site is considered individually in terms of what constitutes an 'appropriate' number of touring unit pitches permitted on existing sites, taking account of the size and character of the existing site. Revised criterion (d) allows for account to be taken of the design, layout and use of individual holiday parks, plus financial viability issues, and this is considered important, in order to promote tourism successfully.

9.5 Bourne Leisure then strongly supports the second part of Policy CC1, which states:

“Proposals for the intensification (increase in pitch number within the existing permitted area), the reorganisation of uses/layout (within the existing site) and the enhancement of site facilities/provision of new facilities in connection with existing sites for tents, touring caravans, static caravans and chalets will be permitted” (subject to criterion a to d)

9.6 With reference to the supporting text to Policy CC1 at paragraphs 5.35 and 5.36 of the Revised Submission Version (2014), the Company considers that policies within the DMP should allow expansion of holiday parks onto land adjacent to or in the vicinity of sensitive areas, provided that commensurate mitigation measures are included, such as a buffer zone or appropriate landscaping. Bourne Leisure therefore endorses the deletion of previous text in the Proposed Submission Version (2013). Paragraph 5.35 of the Revised Proposed Submission document is now appropriately worded and states that:

“it is important any proposals for expansion are sensitive to the impact on the countryside, particularly in terms of preserving and enhancing the landscape and avoiding any adverse impact”.

9.7 The deleted phrase in paragraph 5.30 of the Proposed Submission Version (2013) stated that:

“existing caravan and camping pitches in the district are close to vulnerable ecological and natural habitat areas and their expansion might require specific guidance”.

9.8 In relation to paragraph 5.36 of the Revised Proposed Submission and the statement that the local plan does not include a specific policy criterion requiring use of the site on a seasonal basis, Bourne Leisure considers that whilst extending the holiday season is to be encouraged, this needs to be balanced against the need to ensure that self-serviced accommodation and static holiday caravans and holiday chalets are not used as permanent residences. This is due to the impact this has on the local economy, in terms of additional demand on local services, including health and education. The Company acknowledges the need to have a short break in occupancy in order to ensure that the accommodation is only occupied for holiday purposes and is not occupied as a person's sole or main place of residence; this can be ensured by operators maintaining up-to-date registers of owners/ occupiers of individual caravans/ chalets and the registers being available to the Council.

9.9 Bourne Leisure previously opposed criterion (d) of the Proposed Submission Version (2013) of Policy CC1 (which restricted the time of operation of sites to between 28 February in any one year to 14 January in the following year), as this was too prescriptive. Any time period of closure that is necessary for undertaking necessary maintenance works or ensuring that sites do not become occupied all year round varies on a site by site basis and should be dealt with by means of condition or licence. The Company therefore endorses the approach in paragraph 5.36 of the Revised Proposed Submission document (2014) that:

“assurance that the premises shall not be occupied as a person's sole or main place of residence will be dealt with by condition of the planning permission”.

10.0

Conclusions

10.1

Bourne Leisure considers that the significance of tourism to the national and local economy should be fully recognised within the DMP. In the context of national and local economic considerations and national policy, the DMP now promotes tourism on caravan, camping and chalet sites well. However, it is felt that the Plan could do more to promote high quality visitor accommodation as a general principle and its general approach to tourism development should be to balance economic and natural environment considerations better, in order to promote the visitor economy.